

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE**

DEBRA LEONARD,)	CIVIL ACTION NO. 2:12-cv-00121
)	
Plaintiff,)	
)	
v.)	
)	
ENCORE CAPITAL GROUP, INC., MIDLAND)	
FUNDING LLC, MIDLAND CREDIT)	
MANAGEMENT, INC., NANCY KOHLS and)	
FINKELSTEIN, KERN, STEINBERG &)	
CUNNINGHAM, P.C.,)	
)	
Defendants.)	

JOINT MOTION TO CONTINUE REMAINING DEADLINES BY SIXTY (60) DAYS

COME NOW plaintiff Debra Leonard ("Plaintiff") and defendants Midland Funding, LLC ("Midland Funding"), Midland Credit Management, Inc. ("MCM"), Encore Capital Group, Inc. ("Encore"), Nancy Kohls ("Kohls"), Finkelstein, Kern, Steinberg & Cunningham, P.C. ("FKSC") (collectively, "Defendants"), and hereby request that this Court extend all remaining deadlines in this case by sixty (60) days. As support for its Motion, the parties state as follows:

1. On July 2, 2012, this Court issued a Scheduling Order, including a May 21, 2013 discovery deadline and a October 1, 2013 trial date. [See Doc. 17, Scheduling Order.]
2. The parties have engaged in discovery, but still have some depositions that need to be completed to comply with this Scheduling Order.
3. However, due to scheduling conflicts on both sides, the soonest the parties can schedule to take depositions is late June 2013.
4. Furthermore, the parties are currently working through discovery issues to avoid the need to file motions to compel.

5. The parties need additional time so that Plaintiff can take depositions and to attempt to resolve discovery issues without this Court's intervention.

6. Thus, the parties request an additional sixty (60) days for all remaining deadlines, including the deadlines for discovery and trial.

7. No party will be prejudiced by the granting of this motion.

WHEREFORE, PREMISES CONSIDERED, the parties respectfully request that this Court grant them a sixty (60) day extension for all remaining deadlines in this matter, including a continuant of the trial by sixty (60) days.

Respectfully submitted this 17th day of May, 2013.

/s/ Everett Mechem
Everett Mechem (BPR # 011854)
220 Broad Street, Suite 206
Kingsport, TN 37660
Telephone: (423) 207-1300

Attorney for Plaintiff
DEBRA LEONARD

/s/ Ron E. Cunningham
Ron E. Cunningham (BPR# 901)
Finkelstein, Kern, Steinberg & Cunningham
P.O. Box One
Knoxville, TN 37901
Telephone: (865) 525-0238

Attorney for Defendant
FINKELSTEIN, KERN, STEINBERG & CUNNINGHAM

s/ R. Frank Springfield
Alan D. Leeth (BPR # 022358)
R. Frank Springfield (BPR # 025833)
John Nefflen (BPR # 020226)

BURR & FORMAN LLP
420 North 20th Street, Suite 3400

Birmingham, Alabama 35203
Telephone: (205) 251-3000
Facsimile: (205) 458-5100
aleeth@burr.com
fspringf@burr.com

BURR & FORMAN, LLP
700 Two American Center
3102 West End Ave.
Nashville, TN 37203
Telephone: (615) 724-3237
Facsimile: (615) 724-3337
jnefflen@burr.com

Attorneys for Defendants
ENCORE CAPITAL GROUP, INC., MIDLAND FUNDING,
LLC, MIDLAND CREDIT MANAGEMENT, INC. AND
NANCY KOHLS